

1 **THOMAS F. PITARO, ESQ.**  
2 Nevada Bar No. 001332  
3 1212 S. Casino Center Blvd.  
4 Las Vegas, Nevada 89104  
5 (702) 382-9221  
6 Attorney for Defendant  
7 **WILLIAM BONAPARTE**

8 **UNITED STATES DISTRICT COURT**  
9  
10 **DISTRICT OF NEVADA**

11 **UNITED STATES OF AMERICA,**

12 Plaintiff,

13 vs.

14 **WILLIAM BONAPARTE,**

15 Defendant.

Case No. 2:12-CR-00132-MMD-RJJ

**DEFENDANT'S MOTION TO**  
**CONDUCT A PRE-PLEA PRE-**  
**SENTENCING INVESTIGATION**  
**REPORT AND PROPOSED ORDER**

16 **COMES NOW** the defendant, **WILLIAM BONAPARTE**, by and through his attorney  
17 of record, **THOMAS F. PITARO, ESQ.**, and hereby moves this Court request a Pre-Plea Pre-  
18 Sentence Investigation Report be prepared by the Probation department.

19 1. The defendant is charged in a 10 count Indictment stemming from several alleged  
20 armed robberies. The defendant is unsure of his prior convictions and believes that his criminal  
21 history could be anywhere from a level 1 to a level 3. The disparity in a potential sentence  
22 between these criminal history levels is substantial, and what possible sentence the defendant will  
23 face will highly effect negotiations and the ability to work out a potential guilty plea.

24 2. Undersigned counsel therefore respectfully requests an order that the Department  
25 of Probation conduct a pre-plea pre-sentence investigation report to determine the Defendant's  
26 criminal history category as soon as possible.  
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Law Office  
of  
**Thomas F. Pitaro**  
330 S. THIRD STREET  
SUITE 860  
LAS VEGAS, NV 89101  
(702) 382-9221

**DATED** this 4<sup>th</sup> day of March, 2013.

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

**UNITED STATES OF AMERICA,**

Plaintiff,

vs.

**WILLIAM BONAPARTE,**

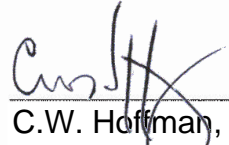
Defendant.

Case No. 2:12-CR-00132-MMD-CWH

**ORDER**

**IT IS HEREBY ORDERED** that the Probation Department will prepare a Pre-Plea Pre-Sentence Investigation Report on Defendant William Bonaparte.

**DATED** this the 5th day of March, 2013.

  
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C.W. Hoffman, Jr.  
United States Magistrate Judge